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8 *Attorneys for Defendants, DIRECTV, LLC and AT&T Services, Inc.*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JORGE OCHOA JR.,

12 Plaintiff,

13 vs.

14 NATIONAL CONSUMER TELECOM &
15 UTILITIES EXCHANGE, INC., AT&T
16 MOBILITY, LLC, DISH NETWORK, LLC,
17 DIRECTV, LLC AND
18 BACKGROUNDCHECKS.COM LLC,

19 Defendants.

Case No.: 2: 22-cv-01430-ART-DJA

20 **JOINT MOTION TO EXTEND**
21 **DEADLINE TO RESPOND TO**
22 **PLAINTIFF’S COMPLAINT (FIRST**
23 **REQUEST)**

24 Plaintiff, Jorge Ochoa Jr. (“Plaintiff”), and Defendant, DIRECTV, LLC and AT&T
25 Services, Inc. (“Defendants”) (collectively “Parties”), by and through their counsel of record,
26 hereby stipulate and agree as follows:

27 On September 2, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendants were served
28 with Plaintiff’s Complaint on September 6, 2022. The deadline for Defendants to respond to
Plaintiff’s Complaint is September 27, 2022. The Parties have discussed extending the deadline
for Defendants to respond to Plaintiff’s Complaint to allow for better investigation of the
allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendants
to file their responsive pleading to Plaintiff’s Complaint to October 27, 2022.

This is the first motion for an extension of time for Defendants to file its responsive
pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
any other party.

1 As part of this motion, Defendants agree to participate in any Rule 26(f) conference that
2 occurs during the pendency of this extension.

3 DATED this 27th day of September, 2022.

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5 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

6 /s/ Ramir M. Hernandez

/s/ Gerardo Avalos

7 Ramir M. Hernandez, Esq.

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9 *Attorneys for Defendant, DIRECTV, LLC and*
10 *AT&T Services, Inc.*

Attorneys for Plaintiff, Jorge Ochoa Jr.

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14 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

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18 DATED: September 28, 2022
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 27th day of September, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP